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Friday, May 20, 2016

Via Electronic CM-ECF

Honorable Stanley R. Chesler, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07101

Re: Adjourning Hearing Date of June 6, 2016 - Case No.: 2:16-cv-00075-SRC-CLW
Terra Finance, LLC and Kofi Osae-Kwapong v. Acrow Corporation of America

Dear Judge Chesler:

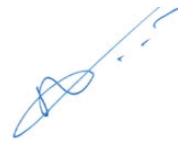
The Law Firm of Omojola & Associates, P.C. represents Plaintiffs Terra Finance, LLC and Mr. Kofi Osae-Kwapong in the matter referenced above.

Pending before your honor is a Motion to Dismiss and a Motion to Compel Arbitration, currently set to be decided on the papers on June 6, 2016, with Plaintiff's Response due on May 23, 2016. We are a very small firm, without as many lawyers or associates as larger adversaries. Due to some complications, particularly the workload on my calendar, the complexity of this issue in light of the facts in this case, and some of the arguments we expect to set forth, I cannot file an adequate or meaningful Response by May 23, 2016. There are also certain factors that further complicate this case, so that it is ideal for the parties and their counsels to meet, before further arguments and documents are filed with the court. Hence, this request that honor adjourn the current hearing date from June 6, 2016 to July 18, 2016. Plaintiff's Response would then be due on July 5, 2016, with the Defendant's Reply due on July 12, 2016. With this extension, the parties may resolve this motion, perhaps without requiring more of the court's time on this case.

Defendant's counsel refused consent to adjourning the hearing date to July 18, 2016.

Thank you for your consideration in this regard.

Respectfully submitted,



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